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Subject Envirochem (ECC) Site, Zionsville, IN - Revised Attachment Z-1



Good afternoon,

Thank you for providing the revised Attachment Z-1 by e-mail on April 29, 2005. Attachment Z-1 is acceptable with the exception of the following comments. Please make the necessary revisions by July 1 and let me know if you would like to discuss the comments further.

Page 1. While the suggestion to refer to the CD in the first paragraph for clarity is appreciated, please add the following for further clarity:

a) in the last sentence of paragraph 1, change "the Consent Decree provides" to "the Consent Decree and the Amended ROD provide" and add "EPA determines that" before "those standards were not met..."

b) in the second sentence of paragraph 2, add "to the Consent Decree" after "Revised Exhibit A"

Comment 4. While the expressed intent was to include all of comment 4, the second part of it is missing. Please change "contemplated" to "required" in the last sentence of paragraph 2 on page 1.

Footnote 7, page 7. For better clarity please change the reference to "the Consent Decree" to "Revised Exhibit A and the Amended ROD"

Comment 16, Part 1. The Trust's response provides an analysis of potential impacts on surface water that focused on demonstrating that the existing contaminated soil does not pose a risk to surface water. However, the concern is that the excavated trench spoils had been proposed for disposal on the site and that the acceptable concentrations for disposal of these soils on the site did not take into account the surface water pathway. This issue still needs resolution. If the disposal of these trench soils is proposed to be under the required cover, the issue is moot.

Comment 16, Part 2. It is agreed that a default fraction of organic carbon (foc) of 0.002 is acceptable. It is also acceptable that a site-specific value can be obtained at a later date and the acceptable soil concentrations can be revised using the site-specific foc. The revised Table Z-1-2 Site-Specific Soil Exposure Calculations were not provided. The values presented in Table Z-1-1 for the Acceptable Soil Concentrations appear to be based on the soil migration to groundwater pathway, **except the values are lower than the IDEM default values by a factor**

of 1,000. It appears that a unit conversion error occurred while calculating the conversion from mg/kg to $\mu\text{g/kg}$. Please verify and revise the entire "Acceptable Soil Concentration ($\mu\text{g/kg}$)" column in Table Z-1-1 and provide the backup Table Z-1-2.

Comment 16, Part 3. The response did not address the issue of whether the contaminated trench spoil soil may be required to be disposed as a special waste under Indiana regulations even if it does not exceed the acceptable soil concentrations.

Comment 22 and 23. Please understand that the Agencies need to have the final decision on when the trenches can be shut down. Specifically, in the last sentence of section 3.1.1, the Trustees would have to first obtain approval from EPA in consultation with IDEM before shutting down individual trenches. Please use the language of comment 23, which simply adds "the parties agree that" before "two consecutive air samples" to the first sentence of section 3.1.2. Also, there is a typo on the last line of page 13 -- "meets" should be "meet."

Comment 24. The Trust calculated background levels in accordance with a strict reading of the USEPA comment that specifies the methodology for calculation of background subsurface water and background surface water concentrations. The methodology requires use of the analytical **detection limit** in the calculation rather than the typical one-half the detection limit. Also, please note that it appears there may have been a significant typographical error in USEPA Comment 24b. The comment reads as follows: "*24.b) Values for the non-detect samples were to be set at of the laboratory detection limit.*" . It appears that "one-half" was inadvertently omitted (note the phrase "set at of" is missing a word), or possibly dropped in text conversion from WordPerfect to Word software. Environ has revised Tables E-1 and E-2 replacing all the one-half detection limit values that had been in Exhibit A previously with the full detection limit, thus raising the background subsurface water and stream concentrations. These all should be revised again using the original methodology of using one-half the detection level.

Also, the revised Table Z-1-1 Site-Specific Acceptable Concentrations did not include the revised acceptable subsurface water background concentrations and stream background concentrations presented in the new Tables E-3 and E-4 based on the new background values using the full detection limit. Rather, the previous background concentrations that were calculated using one-half the detection level rather than the detection level are in the table. Perhaps the Trust realized that there may have been a typographical error and were waiting for further comment prior to revising the tables.

Finally, background levels are often set at "non-detect" for compounds that are not naturally occurring and that have not been detected. However, the methodology provided in Comment 24, by allowing use of elevated detection levels in the background calculation, results in background values above health-based levels, even though the compound has never been detected. This occurs for vinyl chloride in subsurface water. For example, the calculated background value is 4 $\mu\text{g/L}$ using one-half the detection level (8 $\mu\text{g/L}$ using the full detection level) versus the MCL of 2 $\mu\text{g/L}$, even though it has never been detected in the background subsurface water samples. A similar situation also occurs for tetrachloroethene (PCE), and 1,1,2-Trichloroethane (TCA). This concern has not been provided in previous comments to the Enviro-Chem Trustees.

Comment 31. The USEPA comment requires that evaluation of additional measures must be performed if the PRGS effluent exceeds standards. The response states only that the PRGS bed will be replaced and reconditioned. Add the following sentence immediately prior to the last sentence of page 18, paragraph 1: *"If the fresh PRGS bed cannot meet the required standards, additional measures to meet the standards will be evaluated."*

Schedule. The proposed schedule provides 120 days for design. Given that most of Attachment Z-1 has been accepted, please revise the schedule to indicate that the design could be completed within 90 days from acceptance of Attachment Z-1.

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